

IN THE UNITED STATES DISTRICT COURT FOR THE
THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA)
v.) Case No. 1:22-cr-154-07
TARRY JERON "TJ" WILSON)

GOVERNMENT'S RESPONSE TO DEFENDANT'S POSITION ON SENTENCING

In his memorandum in aid of sentencing, Tarry Jeron “TJ” Wilson makes unfounded claims that, upon examination, undermine his arguments rather than further them.

1. Wilson's Relevant Conduct Was Lengthy and Involved a Score of Fighting Dogs

According to Wilson, his “offense and relevant conduct spanned roughly four years, from 2015 to 2019, during which he raised approximately 14 dogs and entered fights with two.” Dkt. #171 at p.5. Every particular in that statement is misleading or simply incorrect.

A. Wilson's Relevant Conduct Started No Later than 2011

First, Wilson's relevant conduct started substantially earlier than 2015. As evidenced by the pedigrees filed as exhibits to our initial sentencing pleading, Wilson filed pedigrees on-line for six fighting dogs in 2013 alone ("Redline"; "Buckshot"; "Bella"; "Beans"; "Lucky"; and "Sky"). *See* Dkt. #170-1. In May 2013, he posted a pedigree on-line for "Lucky," reflecting that he co-owned the dog with Charles Edward "Never Say Never" Williams, III. Dkt. 170-1 at p.12. That same month, he posted a pedigree on-line for "Beans," reflecting that "Beans" was the offspring of a dog owned by Williams. *Id.* at p.2.

Further, on June 23, 2013, he posted a note for “Redline” reflecting that “Redline” was “Game Tested.” *Id.* at p.16. No later than October 13, 2014, he posted a note on-line for the pedigree of “Buckshot,” reflecting that “Buckshot” had by that time already won a fight. *Id* at p.7.

Moreover, in 2015, Wilson posted an on-line pedigree for “Mayweather” reflecting that the dog, born in June 2014, was the offspring of “Beady Bead,” a dog owned by Wilson and Williams, that already had won a fight. *Id.* at p.13. Accordingly, Wilson’s own posts to Pedigrees Online establish that he was fighting dogs at least as early as 2013.

Further, a video camera seized from Wilson in 2020 contained nine videos of dogfights. PSR ¶ 40. Exhibit 1 to this pleading consists of a screenshot of the file directory for those videos, reflecting that they were filmed between January 2011 and April 2012. Wilson can be seen participating in the ring with the dogs in at least five of those videos. Exhibit 2 to this pleading consists of screenshots from those videos, depicting Wilson in the ring with his dogs in at least four different dogfights¹ (including one fight in which he and Williams are together in the ring). In short, Wilson was deeply involved in fighting dogs at least as early as 2011.

B. Wilson’s Relevant Conduct Extended into 2020

Wilson was involved in fighting dogs as late as June 2020. After all, as admitted in his Statement of Facts, “Red Alert” and “Thor” both fought in June 2020. See PSR ¶¶ 85, 89. As explained below, Wilson’s claim that he did not train or fight “Red Alert,” Dkt. #171 at n.2, is untrue - - but it also is irrelevant to the end date of Wilson’s dogfighting; after all, it is undisputed that Wilson entered “Thor” into a fight on that same card with “Red Alert” in June 2020.

Moreover, the assertion that Wilson did not train or fight “Red Alert” is untrue. While Wilson may have allowed Garcia to handle “Red Alert” during a fight, the training was done by Wilson. Enclosed as Exhibit 3 to this pleading is an excerpt from the training logs Wilson kept for his preparation between January and March 2020 for fights involving “Red Alert” and “Thor.” These training logs were seized in the course of the search warrant executed at Wilson’s residence

¹ The videos in Exhibit 2 marked as GX 647 and 648 appear to be depicting different stages of the same dogfight (and the metadata shown in Exhibit 1 reflects that both videos were made within minutes of each other).

on August 20, 2020. The log for the “keep” (i.e, the eight-week period before a fight; *see* PSR ¶ 25) for “Red Alert” details the exercises (walks, pulling chains, treadmill), drugs (steroids, supplements), and weights for “Red Alert” between March 29 and May 7. The handwriting for the log for “Red Alert” matches the handwriting for the log for “Thor”. The logs show that it was not Garcia (from his home in Woodbridge, Virginia) training “Red Alert” and “Thor” during the “keep”; to the contrary, it was Wilson training both dogs at Wilson’s residence in Warsaw.

As evidenced by the training logs, both dogs were trained by Wilson for weeks before the fights.

C. Wilson Kept More than 20 Fighting Dogs

Wilson’s claim that he “raised 14 dogs” between 2015 and 2019 may be true, but it obscures the fact that he *kept and maintained* more than 20 fighting dogs (which were largely - - but not exclusively - - different from the ones that he “raised”). Wilson’s fighting dogs included at least the following:

	Dog	Source of Information
1	Beans	On-line pedigree for Beans; PSR ¶ 48
2	Beaty Bead	On-line pedigree for Mayweather (reflecting that Mayweather was offspring of Never Say Never & City Limits Beaty Bead); <i>see</i> PSR ¶ 31
3	Bella	On-line pedigree for Bella; PSR ¶ 63 ²
4	Bobby Jr.	On-line pedigree for Bobby Jr.; PSR ¶ 50
5	Buckshot	On-line pedigree for Buckshot; PSR ¶ 94
6	Frazier	On-line pedigree for Frazier, and intercepted DMV Board communications; PSR ¶¶ 57, 80
7	John Wick	On-line pedigree for John Wick; PSR ¶ 65
8	Kono	On-line pedigree for Kono, PSR ¶ 46
9	Lil Bella	Intercepted DMV Board communications; PSR ¶¶ 75, 78
10	Lucky	On-line pedigree for Lucky; PSR ¶ 94
11	Mayweather	On-line pedigree for Mayweather; PSR ¶ 49
12	Mr. Bobby	On-line pedigree for Bobby Jr.; PSR ¶ 50

² Wilson claimed that he bred “Bella” but never entered her in a fight, and instead used her as a “therapy” dog. Dkt #171 at p.6. “Bella” was not in demand for breeding fighting dogs, *see* Dkt. #170-1 at 3, PSR ¶¶ 50, 53, 55, 56, 57, 59, because of her ability to detect Wilson’s seizures. She was in demand to breed fighting dogs because, on-line, Wilson characterized her as “MISS FACEOFF Very serious bitch Thoroughly checked!! HEAVY MOUTH AND GREAT ABILITY.”

13	Nook Nook	On-line pedigree for Nook Nook; PSR ¶ 94
14	Red Alert	Intercepted DMV Board communications; PSR ¶ 89
15	Red Line	On-line pedigree; PSR ¶ 94
16	Siri	On-line pedigree; PSR ¶ 51
17	Sky	On-line pedigree; PSR ¶ 94
18	Thor	Intercepted DMV Board communications; PSR ¶ 85
19	Wayne Perry	On-line pedigree; PSR ¶ 47

In sum, the names of at least 19 of Wilson's fighting dogs are included in the PSR. That list, however, does *not* include most of the offspring of Wilson's fighting dogs, that Wilson "raised" and advertised for sale on "Scratch Dog Journal." PSR ¶¶ 55, 56, 59.³ Further, it probably does *not* include the dogs that Wilson entered in the fights in the videos from 2011 and 2012,⁴ or even all of the eight dogs found at Wilson's residence in August 2020.⁵

³ Exhibit 4 to this pleading is the on-line pedigree post for the seven offspring of "'Adams Spartacus 2XW (GIS)' and 'City Limits Bella'" that Wilson advertised for sale on "Scratch Dog Journal". One of the seven dogs listed apparently was "Frazier," but we are unaware of the names of the other six. PSR ¶ 57.

⁴ As of 2015, Wilson listed in his on-line pedigrees that Beans, Buckshot, and Beady Bead had won fights -- and that Redline was "game-tested" -- so it is possible that the 2011 and 2012 videos include depictions of those four dogs. On the other hand, the fact that Wilson did not identify as winners any of the other dogs that he had as of 2015 ("Bella"; "Lucy"; and "Sky") indicates that they were not among the fighting dogs depicted in those videos.

⁵ We suspect that four of the eight dogs seized at Wilson's house in August 2020 were "Red Alert" and "Thor" (winners of the fights in June 2020), "Frazier" (winner of a fight in October 2018), and "Bella". Inasmuch as Wilson had not posted pedigrees on-line for either "Red Alert" or "Thor," it is likely that, by 2020, he was no longer posting pedigrees on-line for his fighting dogs, and that at least *some* of the pit-bull type dogs that he possessed in August 2020 were dogs other than those listed above.

D. Wilson Entered Many Dogs into Fights

Similarly false is Wilson's claim that he only fought two dogs. The following chart lists 10 fights in which we know Wilson entered his dogs:

	Dog	Description	Source of Information
1	Beans	On-line pedigree reflects that Beans was a 1XW OTC	On-line pedigree; PSR ¶ 48
2	Beaty Bead	On-line pedigree for Mayweather reflects that Mayweather was the offspring of "Never Say Never & City Limits Beaty Bead 1XW"	PSR ¶ 31
3	Buckshot	On-line pedigree reflects that Buckshot was a one-time winner 1XDGL "Dead game and all animal. 2:15 R.I.P"	On-line pedigree; PSR ¶ 94
4	Frazier	On or about October 27, 2018, Wilson caused "Frazier" to fight a dog owned by "Gimeline Kennels"; "Frazier" won the fight in 23 minutes	PSR ¶ 71
5	Kono	1XW OTC [off the chain] 1XL, claiming that the dog won a fight in 16 minutes against a dog that was four pounds bigger. "16 min (uphill 4lbs, the clowns picked up and aint wanna pay"	On-line pedigree; PSR ¶ 46
6	Lil Bella	Dog fight in Delaware, January 19, 2019 – Wilson lost \$1000 betting on "Lil Bella" for this fight. ⁶	PSR ¶¶ 74-78;
7	Nook-Nook	1XW-1XDGL	On-line pedigree; PSR ¶ 94
8	Red Alert	Red Alert won a fight in June 2020	PSR ¶¶ 84-85
9	Redline	Pedigree reflects that Redline was "game tested"	On-line pedigree; PSR ¶ 94
10	Thor	Thor won a fight in June 2020	PSR ¶ 89

Of course, this list does *not* include the fights that his dogs lost (except the one lost by Lil Bella in January 2019). It does *not* include the fight involving the dog that he told the DMV Board "woke up" after he and Williams thought she died in a fight. PSR ¶ 72. Because the dogs listed above likely were not old enough to fight in 2011 and early 2012, the list *probably* does not include the fights depicted in the nine videos from his camera dating from between January 2011 and April

⁶ Exhibit 5 to this pleading is an excerpt of a transcript of an interview of Wilson conducted by law enforcement agents on August 12, 2020, containing his admission of that bet. Although the transcript reflects reference to "Bella", the context indicates that the bet was, in fact, on "Lil Bella".

2012. For example, according to Kono’s pedigree, the dog was not born until October 2012. Dkt. #170-1 at 11.

And, of course, the list does *not* include the fights of the dogs that lost their first fight, and did not live to have wins noted on their pedigrees. Inasmuch the life of a fighting dog is to fight or die - - unless and until it becomes a “champion” (at which point it is worth too much for breeding to risk in a fight) - - most of the 19 dogs listed above ultimately died in a fight (or shortly thereafter, at the hands of Wilson himself).⁷ After all, as Wilson told his colleagues on the DMV Board, he *loved* killing dogs that lost fights, because “them [expletives] taking my money, feeding them food, taking my antibiotics and in my yard taking my deck.” PSR ¶ 70.

In short, Wilson was a prolific dogfighter.

2. Wilson “Stayed Away” from Dogfighting Only After His Dogfighting Paraphernalia was Seized for the Second Time

Wilson argues that he “has demonstrated his commitment to rehabilitation by withdrawing from the conspiracy, staying away from dogfighting and other criminal conduct since before his arrest on these charges.” Dkt. #171 at p.4. While technically true, this assertion is misleading, because it suggests that Wilson’s “withdrawal” by the time of his arrest in 2022 was his unconstrained choice. To the contrary, Wilson continued dogfighting in the face of repeated notices of law enforcement activity - - and stopped only after his dogfighting paraphernalia was seized by law enforcement for the *second* time.

Wilson continued dogfighting long after he learned that law enforcement was investigating his associates on the DMV Board. After all, Wilson’s conspirators told him to delete the DMV Board’s messages after “Big Head” was arrested in 2017. PSR ¶¶ 60-62. Later that year, Wilson told dogfighters on “Scratch Dog Journal” that they shouldn’t describe their fights on Facebook,

⁷ The exceptions would be “Bella”, “Frazier”, “Red Alert” and “Thor”, to the extent that they were four of the eight fighting dogs seized from Wilson’s residence in 2020.

because he knew two people that did so and got “locked up.” PSR ¶ 64. In 2018, Wilson knew that Rodriguez Norman was incarcerated, PSR ¶ 67, and Harvey told Wilson to take down the DMV Board after Harvey’s dogs were seized. PSR ¶ 66. In January 2019, in response to a news article posted to the DMV Board regarding an individual charged with running a dogfighting operation, Wilson warned his fellow dogfighters, “People like dogs. They don’t like what we doing to them, though, I bet you that.”

Wilson’s own dogfighting paraphernalia was seized in connection with a search of his residence on June 19, 2019. PSR ¶ 38. Yet, even after that raid, he continued to engage in dogfighting. Indeed, his fights for “Red Alert” and “Thor” in June 2020 reflect that having his dogfighting paraphernalia seized the previous year failed to induce him to stop. So, while Wilson may have “stayed away” from dogfighting before his arrest in 2022, that likely was attributable to the fact that his dogs were seized (along with his dogfighting paraphernalia -- again) in August 2020.

Wilson deserves three years of incarceration.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on June 14, 2023, I electronically filed a copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/
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